

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**CenterPoint Energy Field Services, Inc.  
Foxskin Compressor Station  
Oakland, Bossier Parish, Louisiana  
Agency Interest Number: 39922  
Activity Number: PER20080003  
Proposed Permit Number: 0400-00002-V6**

**I. APPLICANT**

**Company:**

CenterPoint Energy Field Services, Inc.  
1111 Louisiana, 11th Floor  
Houston, Texas 77002

**Facility:**

Foxskin Compressor Station  
One mile southeast of Oakland, Bossier Parish, Louisiana  
UTM Coordinates: 450.58 kilometers East and 3592.19 kilometers North, Zone 15.

**II. FACILITY AND CURRENT PERMIT STATUS**

Natural gas from offsite wells is routed to separators to remove any entrained liquid prior to being compressed and dehydrated. The dry gas is then sent to a downstream natural gas plant. Vents from the glycol dehydrator still columns are routed through condensers and then burned in the reboilers' fireboxes.

The Foxskin Compressor Station currently operates under Part 70 Operating Permit 0400-00002-V5, issued March 13, 2007, which was amended September 4, 2007, November 20, 2007, and May 20, 2008.

**III. PROPOSED PROJECT/PERMIT INFORMATION**

**Application**

A permit application dated August 14, 2008 was submitted requesting a Part 70 operating permit modification.

**Project**

CenterPoint Energy Field Services requests a permit modification to 1) construct ten compressor engines, three glycol dehydration units, and six condensate storage tanks; 2) add oxidation catalyst on an existing compressor engine; 3) increase tank truck loading; 4) remove the pressurized tank; and 5) recalculate fugitive emissions.

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**Proposed Permit**

This permit modification (Permit 0400-00002-V6) is a preconstruction and operating permit for the expansion project at the Foxskin Compressor Station.

**Permitted Air Emissions (tons/year)**

Pollutant	Before	After	Change
PM/PM <sub>10</sub>	4.60	9.14	+ 4.54
SO <sub>2</sub>	0.29	0.59	+ 0.30
NO <sub>x</sub>	247.85	482.47	+ 234.62
CO	236.44	234.21	- 2.23
VOC	120.42	239.75	+ 119.33

**IV REGULATORY ANALYSIS**

The applicability of the appropriate standards is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

**Applicability and Exemptions of Selected Subject Items**

The explanations for the non-applicability and exemptions of selected subject items are listed in Table XI of the proposed permit.

**Prevention of Significant Deterioration/Nonattainment Review**

Criteria pollutants emissions from the existing Foxskin Compressor Station are less than the PSD major source thresholds. Criteria pollutants emissions from the modification itself will also be less than the PSD major source thresholds. Therefore, PSD review is not required.

**Streamlined Equipment Leak Monitoring Program**

The permit does not include any Streamlined Equipment Leak Monitoring Program.

**MACT Requirements**

Formaldehyde emissions are from natural gas fired engines. Therefore, these emissions are exempt from the Louisiana Air Toxic Regulations. The facility is classified as a minor source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Formaldehyde emissions are above the Hazardous Air Pollutants (HAP) major source threshold of 10 tons per year. The station is considered a major source of HAP under the federal program. HAP emissions from all compressor engines, except Engine 1-01, are controlled as required by 40 CFR 63 Subpart ZZZZ.

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**Air Quality Analysis**

Emissions were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. The proposed project did not require the applicant to model emissions.

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**V. PERMIT SHIELD**

This permit does not contain any permit shield.

**VI. PERIODIC MONITORING**

To demonstrate compliance with the permit limits and applicable standards, operating parameters and emissions from the station are monitored as required by LAC 33:Chapter 21, 40 CFR 60 Subpart JJJ, 40 CFR 63 Subparts HH, ZZZZ, and 40 CFR Part 64.

**VII. GLOSSARY**

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H<sub>2</sub>S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

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New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO<sub>x</sub>) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit:  $\geq 10$  tons per year of any toxic air pollutant;  $\geq 25$  tons of total toxic air pollutants; and  $\geq 100$  tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM<sub>10</sub> – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.